Umsetzung der im Rahmen des Fair Finance Guides erhobenen Kriterien in der oekom research Ratingsystematik

Erläuerungen zur Bewertung des Fair Finance Guides sowie der Umsetzung der Kriterien in unserer Bewertungssystematik
Wir halten die Einhaltung von gesetzlichen Regelungen und internationalen Vereinbarungen, wie zum Beispiel UN Konventionen, wie sie im Fair Finance Guide beschrieben sind, für einen wesentlichen Baustein des ethisch-nachhaltigen Investierens. Die Tabelle ve rdeutlicht die Umsetzung der Kriterien des Fair Finance Guides im Rahmen der ISS ESG Ratingsystematik, die von der Bank für Kirche und Diakonie für die Steuerung der Eigenanlagen, die Beratung der Kunden und das Asset Management (im Bereich der Vermittlung von Vermögensverwaltungs- und Spezialfondsmandaten) zu Einsatz kommt.
Darüber hinaus gilt dieser Anspruch auch uneingeschränkt für das Kundenkreditgeschäft (Corporate credits und Project finance) der Bank für Kirche und Diakonie. Um Kontroversen zu vermeiden und die Güte des Kreditgeschäftes zu verdeutlichen, hat die Bank für das Kundenkreditgeschäft (Corporate credits und Project finance) zudem Branchenausschlüsse für die in der rechten Spalte dargestellten Sachverhalte, insbesondere für die Bereiche Waffen, Minenbetreiber, Öl und Gas sowie fossile und atomare Stromerzeugung festgelegt, die im Rahmen der Kreditvergabe berücksichtigt werden.
Da der Fair Finance Guide ausschließlich in englischer Sprache erhoben wird, bitten wir um Verständnis, dass wir die Gegenüberstellung nur in englischer Sprache zur Verfügung stellen können. Die Überschriften, die Sortierung und die Nummerierung entsprechen den Untersuchungsfeldern des Fair Finance Guides. Details zur Umsetzung der Kriterien in den Anlageprozess der Bank entnehmen Sie bitte der Broschüre zum Nachhaltigkeitsfilter, die Sie unter www.KD-Bank.de/Nachhaltigkeitsfilter im Internetauftritt der Bank finden.

Climate Change

Grundsätzliche Aussagen zum Themenfeld Climate Change =>
Im Sommer 2020 unterschrieb die KD-Bank gemeinsma mit 15 weiteren Finanzinstituten eine Selbstverpflichtung. Wir vereinbaren mit dieser gemeinsam entwickelten Selbstverpflichtung, unsere Kredit- bzw. Investmentportfolien im Einklang mit den Zielen des Pariser Klimaabkommens auszurichten und durch die Finanzierung der Transformation hin zu einer emissionsarmen und klimaresilienten Wirtschaft und Gesellschaft, die Erderwärmung auf deutlich unter 2 Grad zu begrenzen und das 1,5 Grad Ziel anzustreben.
Pressemitteilung >> https://www.kd-bank.de/wir_fuer_sie/presse/dnk-selbstverpflichtung-klima.html

Fair Finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credit und Project finance)
8	The financial institution does not finance, or invest in, companies which are active in coal-fired power generation and/or coal mining for more than 30% of their activities.	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales), total coal-related activities (> 20 % of net sales), coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
9	The financial institution does not finance, or invest in, companies which are active in fossil fuel-fired power generation and/or extraction of oil and gas for more than 30% of their activities.	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales), total coal-related activities (> 20 % of net sales), coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
10	The financial institution does not finance, or invest in, companies which are active in coal-fired power generation and/or coal mining for more than 0% of their activities.	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales), total coal-related activities (> 20 % of net sales), coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
11	The financial institution does not finance, or invest in, companies which are active in fossil fuel-fired power generation and/or extraction of oil and gas for more than 0% of their activities.	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales), total coal-related activities (> 20 % of net sales), coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
12	Companies disclose their direct and indirect greenhouse gas emissions.	Yes	– Greenhouse gas emission inventories	
13	Companies reduce their direct and indirect greenhouse gas emissions.	Yes	– Greenhouse gas emission reduction targets and action plans – Greenhouse gas emission intensity – Carbon intensity (business travel)	
14	Companies switch from using fossil fuels to renewable energy sources.	Yes	– Energy use by source – Alternative drives and fuels	
12	Unabated coal-fired power generation (i.e. without operational carbon capture and storage) is unacceptable.	Yes	- exclusion criterion: total coal-related activities (> 20 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
16	Coal-fired power generation is unacceptable.	Yes	- exclusion criterion: coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
17	Fossil fuel-fired power generation in unacceptable	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
18	Coal mining is unacceptable.	Yes	- exclusion criterion: coal producer (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
19	Extracting oil from tar sands is unacceptable	Yes	- exclusion criterion: tar sand	exclusion criterion: Corporate credits and Project finance (100 %)
20	Extracting oil and gas in unacceptable	Yes	- exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
21	Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. new palm oil plantations on primary tropical/rain forest land)	exclusion criterion: Corporate credits and Project finance (100 %)
24	Companies do not participate in lobbying (attempting to influence decisions made by regulators) aimed at weakening climate policy	Yes	– Transparency on participation in public policy making and lobbying activities	
22	Companies integrate criteria on climate change in their procurement and operational policies.	Yes	– Position on climate change – Environmental management in the supply chain	

22	The production of biomaterials complies with the 12 principles of the Roundtable on Sustainable Biomaterials (RSB).	No		
23	CO2-compensation is certified according to the Gold Standard.	Partly	- Business travel: Carbon offset programme (no certification required)	
26	Companies include clauses on the compliance with criteria on climate change in their contracts with subcontractors and suppliers.	Yes	- Environmental supplier standard: Greenhouse gas emissions	Content of environmental supplier standard: i. Environmental management system ii. Resource efficiency: energy, water and material consumption

Human Rights

Grundsätzliche Aussagen zum Themenfeld Human Rights =>
Der Verhaltenskodex der Bank für Kirche und Diakonie sowie die im Nachhaltigkeitsfilter genannten Ausschlüsse umfassen ausdrücklich auch die United Nations Guiding Principles on Business and Human Rights (UNGPs) und die Free Prior Informed consent (FPIC) Prinzipien, die die Rechte der indigenen Bevölkerung sichern und schützen sollen.

Fair Finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
2	Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights (UNGPs).	Yes	– Policy on human rights – Human rights due diligence procedures – Major controversies relating to human rights	
3	Companies have a policy commitment to meet their responsibility to respect human rights.	Yes	– Policy on human rights	
4	Companies have a *human rights due diligence process* to identify, prevent, mitigate and account for how they address their impact on human rights.	Yes	– Human rights due diligence procedures	
5	Companies have processes to enable the *remediation* of any adverse human rights impact to which they cause or to which they contribute.	Yes	– Human rights due diligence procedures (Grievance and remedies)	
6	Companies establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.	Yes	– Policy on human rights	
7	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation - Policy on human rights: Resettlement and compensation.	exclusion criterion: Corporate credits and Project finance (100 %)
8	Companies prevent conflicts over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of the land users involved.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation - Policy on human rights: Resettlement and compensation.	exclusion criterion: Corporate credits and Project finance (100 %)
	Companies have special attention for respecting the rights of women, especially to prevent discrimination and to improve equal treatment of men and women.	Yes	– Policy on non-discrimination – Measures to promote equal opportunities and diversity – Gender distribution	
9	Companies have special attention to respect the rights of children.	Yes	– Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions – Policy on responsible marketing (child protection) – Policy/measures to prevent (child) sex tourism	

10	Companies do not enable settlements, including their economic activities, in occupied territories in respect of International Humanitarian Law.	Yes	– Exclusion criterion: Human Rights Controversies – Major controversies relating to human rights Activities in occupied/disputed territories are assessed within the exclusion criterion Human Rights. International humanitarian law establishes obligations on occupying powers concerning, inter alia, humane treatment and physical integrity of the people in the disputed territory, respect for existing laws, respect for and protection of real and personal property, and the management of public property, including natural resources. The Fourth Geneva Convention also prohibits the occupying power from transferring parts of its own civilian population into the territory that it occupies. Regarding all these issues, companies operating in occupied /disputed territories may become complicit in human rights violations of the people in the occupied region. The severity of the assessment depends on the question how direct the company's activities contribute to the violation of the human rights of the affected people: A severe controversy / exclusion is assigned in cases where the company, with its products/services, directly contributes to the human rights violation (e.g. of the right to self-determination, the right to freedom) of people in disputed territories (e.g. Palestine, Western Sahara), e.g. through offering surveillance equipment clearly intended to be used to prevent Palestinian people's freedom of movement; offering services used in the demolition of e.g. Palestinian property; offering considerable mortgage loans to Israeli settlers to build new houses for	
11	Companies integrate human rights criteria into their procurement and operational policies.	Yes	The supplier standard has to be signed by suppliers. The wording of the standard (or the vast majority of its requirements) is binding. Bindingness consists of two requirements, only in case both are met for all (or the vast majority) of standards a grade is awarded: 1) suppliers have to sign the standard / contractually abide by the standard (e.g. by incorporating standard into contracts) 2) wording of the standard must be binding (e.g. "suppliers shall/are required" / "we expect suppliers to..." instead of "suppliers should/are encouraged") The following indicators are checked: prohibition of forced labour prohibition of child labour Reference to ILO Freedom of Association Health and Safety Wages Working Time Regular employment migrant workers harrasment and abusive behaviour discrimination Inclusion of extended supply chain	

Labour Rights

Umsetzung der im Rahmen des Fair Finance Guides erhobenen Kriterien in der oekom research Ratingsystematik

Grundsätzliche Aussagen zum Themenfeld Labour Rights =>
Die Bank für Kirche und Diakonie hält die ILO-Kernarbeitsnormen (Vereinigungsfreiheit und Recht auf Kollektivverhandlungen, Beseitigung der Zwangsarbeit, Abschaffung der Kinderarbeit, Verbot der Diskriminierung in Beschäftigung und Beruf) ein und hat entsprechende Prozesse implementiert. Das Compliance Regelwerk der KD-Bank beinhaltet Regelungen zum Verhalten der Bank zur Verhinderung der Geldwäsche, der Terrorismusfinanzierung sowie sonstiger strafbarer Handlungen. Im Falle einer strafbaren Handlung eines Zulieferers im Rahmen der Geschäftsbeziehung zur KD-Bank gelten diese Regelungen uneingeschränkt. Zu den strafbaren Handlungen zählen wir selbstverständlich auch strafbare Verstöße gegen die ILO-Kernarbeitsnormen.

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
3	Companies uphold the freedom of association and the effective recognition of the right to collective bargaining.	Yes	– Policy on freedom of association and collective bargaining – Measures to ensure freedom of association and facilitate collective bargaining – Major controversies relating to freedom of association	
4	All forms of forced and compulsory labour are unacceptable.	Yes	– Exclusion criterion: violation of labour rights (forced labour)	
5	Child labour is unacceptable.	Yes	– Exclusion criterion: violation of labour rights (child labour)	
6	Discrimination in respect of employment and occupation is unacceptable.	Yes	– Exclusion criterion: violation of labour rights (discrimination)	
7	Companies are committed to fair recruitment practices.	Yes	Policy on non-discrimination: The indicator evaluates the existence and quality of the company's policy with regard to equal opportunities, discrimination and harassment. The non-discrimination principles need to cover all aspects of employment, including recruitment, job assignment, promotion, remuneration, training and benefits.	
8	Companies pay a living wage to their employees.	Yes	– Exclusion criterion: violation of labour rights (other) – Positive criterion: Payment practices (positive criterion applicable for all companies/industries with substantial part of untrained and/or blue collar workforce in countries with high risk exposure) ISS ESG's assessment requires: a) a formal policy or policy-like statement (comprehensive guidelines, principles or commitments) regarding the company's payment practices, which is b) substantiated with corresponding data. Credible information that the company pays wages significantly above the minimum wage (or the respective subsistence wage), backed up by corresponding data, results in a positive assessment; the payment of a 'living wage' (Note: Refers to the entry-level wage, not the average wage!) throughout the company's operations can be considered best practice. In case the company provides information according to GRI EC5 (Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation), only ratios of 1.5 (i.e. payment of 150% of the local minimum wage) or better are accepted (as being 'significantly above (...)') For countries of operation not covered by the company's reporting according to GRI EC5 (i.e. countries where no legally mandated minimum wage exists), the lowest wage paid should be disclosed; for these operations, a positive assessment requires the payment of wages significantly above the respective subsistence wage, again substantiated with corresponding data. Anmerkung Rankabrand: Minimum wage and maximum working hours are covered by German law, despite no ratification of the relevant ILO norms; even though church law has a different payment agreement, this must not fall below a living wage, therefore score for CoP and CC only. Via its 'Nachhaltigkeitsfilter', which is	Corporate credits an Project finance: exclusion of any company which do not pay living wages to there employees
9	Companies apply a maximum of working hours.	Yes	– Work-life balance	
New Wording	Companies have a comprehensive health and safety policy.	Yes	– Health and safety management system	

New Wording	Companies ensure equal treatment and working conditions for migrant workers.	Yes	– Policy on non-discrimination – Measures to promote equal opportunities and diversity -- Supplier standard with regard to labour rights and working conditions: Migrant workers	exclusion criterion: Corporate credits and Project finance (100 %)
12	Companies have a clear management system to monitor and, if needed, correct compliance with norms on labour law.	Yes	– Measures to ensure freedom of association and facilitate collective bargaining (assessing the existence of structural management aspects such as communication of rights, grievance procedures etc.) – Measures to promote equal opportunities and diversity (assessing the existence of structural management aspects such as targets, action plans etc.) – Implementation of a health and safety management system – Measures to ensure responsible workforce restructuring – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions *Anmerkung Rankabrand: Whether having a clear management system to monitor and, if needed, correct compliance with norms on labour law isn't specified as a generally necessary criteria by KD Bank in its 'Nachhaltigkeitsfilter (see link, page 2-3).*	
13	Companies establish procedures on how to deal and process employee complaints and to solve violations and conflicts, preferably in consultation with the relevant trade union.	Yes	- Business ethics: Compliance procedures - Facilitation of non-compliance reporting / Whistleblower protection - Freedom of association and the right to collective bargaining: Measures to ensure freedom of association and facilitate collective bargaining - Grievance procedures	Die KD-Bank verfügt über einen Betriebsrat, der die Interessen der Mitarbeitenden vertritt (siehe Bericht DNK 2016). Die Einbindung von Gewerkschaften im Konfliktfall obliegt dem Betriebsrat und wird von der KD-Bank in keiner Weise eingeschränkt.
14	Companies integrate labour rights in their procurement policies.	Yes	– Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions	
15	Companies include clauses on the compliance with criteria on labour rights in their contracts with subcontractors and suppliers.	Yes	– Supplier standards with regard to labour rights and working conditions	

Nature

Grundsätzliche Aussagen zum Themenfeld Nature =>
Die Bank für Kirche und Diakonie schließt Finanzierungen (Kredite und Projektfinanzierungen), bei denen der Zugang zu Wasser, die Biodiversität und bedrohte Tierarten, die auf der roten Liste IUCN stehen, generell aus.

	Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:	Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
1	Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the areas they manage.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. projects or practices deliberately, severely and unreversibly impacting on ecosystems with very high biodiversity and conservation value - e.g. mining in (protected) primary rainforests or below glaciers)	

2	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. industrial activities high/unreversible negative impacts in IUCN categories I-IV)	
3	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. industrial activities in Unesco World Heitage sites protected for their environmental value) – exclusion criterion: Human Rights (e.g. industrial activities in Unesco World Heitage sites protected for their cultural value)	
4	Companies prevent the negative impact on protected areas that fall under the Ramsar Convention on Wetlands.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. industrial activities with high/unreversible negative impacts in Ramsar Wetlands)	
5	Companies prevent negative consequences for the populations or the number of animal species that are on the IUCN Red List of Threatened Species.	Yes	– exclusion criterion: Controversial Environmental Practices (e.g. industrial activities with high/unreversible negative impacts on threatened species) --> Biodiversity is considered in general for some high-exposure sectors (e.g. Metals&Mining, Construction). Both CITES and the IUCN Red List fall within our normative scope and are covered under the keyword "Failure to prevent depletion of biodiversity" (defined as: Activities that impact fragile ecosystems or areas that are known to be especially productive ecosystems, where the danger to a species has been cited.)	exclusion criterion: Corporate credits and Project finance (100 %)
6	Trade in endangered plant and animal species complies with the CITES conditions.	Yes	Both CITES and the IUCN Red List fall within our normative scope and are covered under the keyword "Failure to prevent depletion of biodiversity" (defined as: Activities that impact fragile ecosystems or areas that are known to be especially productive ecosystems, where the danger to a species has been cited.)	
7	Trade in endangered plant and animal species that are on the CITES lists is unacceptable.	No	Both CITES and the IUCN Red List fall within our normative scope and are covered under the keyword "Failure to prevent depletion of biodiversity" (defined as: Activities that impact fragile ecosystems or areas that are known to be especially productive ecosystems, where the danger to a species has been cited.)	exclusion criterion: Corporate credits and Project finance (100 %)
8	Activities in the field of genetic materials and genetic engineering only take place if they meet the permission and processing requirements as described in the UN Convention on Biological Diversity and the related Bonn Guidelines or Nagoya Protocol.	Yes	– Environmental aspects of products (Genetic modification) – Policy on human rights (Genetic resources and traditional knowledge) – Policy on genetically modified trees – Policy on the use of genetically modified cotton – Policy on the use of ingredients derived from genetically modified raw materials	
9	Production of, or trade in, living genetically modified organisms can only take place if permission has been obtained from the importing country and all requirements of the Cartagena Protocol have been met.	Yes	– Environmental aspects of products (Genetic modification) – Policy on human rights (Genetic resources and traditional knowledge) – Policy on genetically modified trees – Policy on the use of genetically modified cotton – Policy on the use of ingredients derived from genetically modified raw materials	
10	Companies prevent the introduction of invasive alien species in ecosystems	Yes	– Environmental impact on biodiversity from vessel operations – Contractor standards on biodiversity protection from vessel operations	
11	Companies conduct water scarcity impact assessments and prevent negative impacts in water scarce regions.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress, Freshwater use inventories, Freshwater use reduction targets and action plans)	

New Wording	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress) – Human rights due diligence procedures (Human rights risk and impact assessment) – exclusion criterion: Human Rights (e.g. industrial activities in Unesco World Heitage sites protected for their cultural value) - Policy on human rights: Right to water	exclusion criterion: Corporate credits and Project finance (100 %)
13	Companies make an environmental impact assessment on the total consequences of a large scale project on biodiversity, at least according to GRI 304: Biodiversity 2016 or other relevant standards (mentioned in section 2.8.2).	Yes	– Biodiversity management (Risk and impact assessments, Consultation with biodiversity experts, Targets and objectives, Mitigation measures, Monitoring and evaluation)	
14	Companies integrate criteria on nature into their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies	

Taxes and Corruption

Grundsätzliche Aussagen zum Themenfeld Taxes and Corruption =>
Die Bank für Kirche und Diakonie verfügt über eine Organisationsanweisung zur "Verhinderung der Geldwäsche, der Terrorismusfinanzierung sowie der sonstigen strafbaren Handlungen". Diese Organisationsanweisung ist allen Mitarbeitenden der Bank zugänglich und von ihnen verbindlich zu beachten. Alle Angestellten der Bank haben entsprechende Schulungen erhalten und werden regelmäßig in Bezug auf die Prävention gegen strafbare Handlungen sensibilisiert.

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
9	Companies publish their full group structure, including indirectly and jointly-owned entities.	Partly	ISS ESG considers the company strucutre when evaluating sustainability performance and assessing controversial buiness areas. E.g. subsidiaries, joint ventures, M&A processes.	
New Wording	Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture or affiliates located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.	Yes	– Tax base erosion and profit shifting (Transparency on presence in jurisdictions enabling tax base erosion and profit shifting)	exclusion criterion: Corporate credits and Project finance (100 %)
11	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).	Yes	– Public disclosure of payments to government – Public disclosure of financial assistance received from governments	
12	Companies focus their international enterprise structure and their international transactions in a way that reflects the economic substance of the activities and transactions undertaken, without any steps made primarily to secure a tax advantage.	Yes	– Tax base erosion and profit shifting (Policy on presence in jurisdictions enabling tax base erosion and profit shifting) – Public disclosure of payments to government – Public disclosure of economic activity (Revenues by country, Production volume by country)	
13	Companies publish any company-specific tax rulings it has obtained from tax authorities.	Yes	– Public disclosure of payments to government – Public disclosure of financial assistance received from governments (including e.g. tax reliefs)	
14	Companies make public, to the extent legally and practically possible, the decision of any adjudication or arbitration to which it, or any of its subsidiaries, is a party, undertaken to resolve a tax dispute, whether in a court or in an arbitration setting.	Yes	– Major controversies relating to financial relations with governments – Sustainability reporting – Major controversies relating to business ethics – Exclusion criterion: Business Malpractice (Taxes)	
15	Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of facilitating tax evasion.	Yes	– Code of conduct regarding fair business practices – Measures to ensure fair business practices	
16	Companies integrate criteria on tax in their procurement policies and operational policies.	Yes (operational policies)	- tax base erosion and profit shifting	
17	Companies include clauses on the compliance with criteria on tax in their contracts with subcontractors and suppliers.	No		

C7	Companies publicly disclose their ultimate beneficial owner or owners including full name, date of birth, nationality, jurisdiction of residence, number and categories of shares, and if applicable the proportion of shareholding or control.	Partly	- Shareholder strucuture (disclosure of holder types); details on shareholders are usually available to ISS ESG.	
C8	Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.	Yes	Ausschluss von kontroversen Geschäftspraktiken: Als Verstoß gelten Fälle massiver Missachtung von gesetzlichen Vorschriften oder allgemein anerkannter Wohlverhaltensregeln im Bereich der Korruption, zum Beispiel durch die Annahme von Bestechungsgeldern sowie die Bestechung Dritter.	
C9	Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of corruption.	Yes	Code of conduct regarding fair business practices, "Measures to ensure fair business practices"	
C10	Companies report on their participation in the decision-making processes of international norms and legislation (lobby practices).	Yes	Transparency on participation in public policy making and lobbying activities	
C11	Companies integrate criteria on corruption in their procurement policies and operational policies.	Yes	- Code of business ethics: Corruption - Compliance procedures: Third party anti-corruption due diligence	
C12	Companies include clauses on the compliance with criteria on corruption in their contracts with subcontractors and suppliers.	Yes	- Compliance procedures: Third party anti-corruption due diligence	

Arms

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
1	Use, production, development, maintenance, testing, stockpiling of and trade in in anti-personal landmines, including key components of landmines, is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
2	Use, production, development, maintenance, testing, stockpiling of and trade in cluster munitions, including key components of cluster munitions, is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
3	Use, production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, in or to countries that have not ratified the Non-proliferation Treaty is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
4	Use, production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
5	Use, production, development, maintenance, testing, stockpiling of and trade in chemical weapons, including key components of chemical weapons, is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
6	Use, production, development, maintenance, testing, stockpiling of and trade in biological weapons, including key components of biological weapons, is unacceptable.	Yes	– Exclusion criterion: military (producers banned weapons)	exclusion criterion: Corporate credits and Project finance (100 %)
7	Use, production, development, maintenance, testing, stockpiling of and trade in lethal autonomous weapons systems (LAWS), including components designed for LAWS, is unacceptable.	Partly	The production and trade of LAWs is unacceptable. This is covered by 'military products'. Currently, no clear definition exists on an international accepted level as to what systems qualify as LAWs within the supply chain / production of key components. KD-Bank and ISS are in intense discussions to find a solution.	
8	Goods that are essential for military purposes, but can also be used for civilian products ('dual-use' goods), are considered as military goods when they have a non-civilian purpose.	No		
9	Supply of arms and weapons systems, military transport systems, and other military goods to countries that are under a United Nations or relevantmultilateral arms embargo, is unacceptable.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
10	Supply of arms and weapons systems, military transport systems, and other military goods is unacceptable if there is an overriding risk that the arms will be used for serious violation of international human rights and humanitarian rights.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
11	Supply of arms and weapons systems, military transport systems, and other military goods to countries that violate human rights, is unacceptable.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
12	Supply of arms and weapon systems, military transport systems, and other military goods to parties involved in conflict is unacceptable, unless to parties acting in accordance with a UN Security Council resolution.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
13	Supply of arms and weapons systems, military transport systems, and other military goods to countries that are sensitive to corruption, is unacceptable.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
14	Supply of arms and weapons systems, military transport systems, and other military goods to countries having a failed or fragile state, is unacceptable.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)
15	Supply of arms and weapons systems, military transport systems, and other military goods to countries that spend a disproportionate part of their budget on purchases of arms, is unacceptable.	Yes	- Exclusion criterion: supply of military goods (> 5 % of net sales)	exclusion criterion: Corporate credits and Project finance (100 %)

	The policy does not mention exceptions for certain types of investment, financing and/or asset classes of the financial institution.	Yes		exclusion criterion: Corporate credits and Project finance (100 %)
	The policy does not mention exceptions for activities or projects that are not related to the production of weapons.	Yes		exclusion criterion: Corporate credits and Project finance (100 %)

Forestry

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
1	Forest construction companies identify and protect the High Conservation Value (HCV) areas within the forests they manage.	Yes	– Forest/plantation management	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
3	Companies throughout the wood supply chain prevent the use of illegally cut and traded timber.	Yes	– Sourcing of fresh wood/fibre (Measures to exclude procurement of fresh wood/fibre from unsustainable sources)	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
4	Pulp and paper factories restrict the use of chemicals and the pollution of soil, water and air by making use of the best available techniques.	*Yes*	– Requirements regarding wastewater treatment at mills – Measures regarding reduction / responsible use of controversial chemicals – Use of environmentally preferable bleaching processes – Policy on sustainable forest/plantation management – Measures regarding sustainable forest/plantation management	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
5	Companies respect the rights of local and indigenous communities on the fair and equal use of forests.	*Yes*	– Policy on human rights (Indigenous peoples and traditional livelihoods)	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
6	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	*Yes*	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods)	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
7	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	*Yes*	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods)	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
8	Production forests and timber plantations are certified according to the criteria of the Forest Stewardship Council (FSC).	Yes	Forest/plantation area certified to sustainable forest management standards, including FSC certification. This indicator assesses the percentage of wood (products) sold/produced by the company certified to sustainable forest management standards.	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
9	Production chains of timber traders and companies in the wood product chain (including pulp, paper, veneer, furniture) are certified according to the FSC Chain of Custody criteria.	Yes	– Procurement of fresh wood/fibre certified to sustainable forest management standards Forest/plantation area certified to sustainable forest management standards, including FSC certification. This indicator assesses the percentage of wood (products) sold/produced by the company certified to sustainable forest management standards.	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
11	Companies publish a sustainability report that may contain (a number of) the Standard Disclosures from the GRI G4 Sustainability Reporting Guidelines.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting) Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association
12	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the GRI G4 Sustainability Reporting Guidelines.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting)	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association

13	Companies integrate social, economic and environmental criteria in their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions	Corporate credits and Project finance: exclusion of companies in the forestry sector by articles of the association

Food

	Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:	Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
1	Companies respect the right to adequate food.	Yes	– Policy on human rights	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
2	Companies respect the ILO Declaration on Fundamental Principles and Rights at Work.	Yes	see "Labour rights" folder	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
3	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods)	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
4	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods)	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
5	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Yes	– Policy on sustainable agricultural practices in company and supply chain – Measures to promote sustainable agricultural practices in company and supply chain – Stock farming in company and supply chain: Measures to ensure sustainable animal feed – Measures to ensure sustainable fish farming in company and supply chain	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
6	Companies prevent negative impact on UNESCO World Heritage sites.	Yes	– Policy on sustainable agricultural practices in company and supply chain – Measures to promote sustainable agricultural practices in company and supply chain – Stock farming in company and supply chain: Measures to ensure sustainable animal feed – Measures to ensure sustainable fish farming in company and supply chain	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
7	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Yes	– Policy on sustainable agricultural practices in company and supply chain – Measures to promote sustainable agricultural practices in company and supply chain – Stock farming in company and supply chain: Measures to ensure sustainable animal feed – Measures to ensure sustainable fish farming in company and supply chain	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
8	Activities in the field of genetic materials and genetic engineering only take place if they meet the permission and processing requirements described in the UN Convention on Biological Diversity and the related Bonn Guidelines or Nagoya Protocol.	Yes	– Environmental aspects of products (Genetic modification) – Policy on human rights (Genetic resources and traditional knowledge) – Policy on genetically modified trees – Policy on the use of genetically modified cotton – Policy on the use of ingredients derived from genetically modified raw materials	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
9	Production of, and trade in, living genetically modified organisms can only take place if permission of the importing country has been obtained and all requirements of the Cartagena Protocol have been met.	No		Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
10	Companies respect the Five Freedoms of animals.	Yes	– Stock farming in company and supply chain: Measures to ensure animal welfare on the farm, during transport and slaughter or killing	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association

11	Very restricted housing methods for calves (in crates), hens (in battery cages) and sows (in feeding cubicles) are unacceptable.	Yes	– Animal welfare standards (a Breeds, b Living environment, c Mutilation, d Feed and medication, e Transportation, f slaughter) – Measures to ensure and promote animal welfare (a Procedures to ensure animal welfare on the farm, during transport and slaughter, b Promoting knowledge and innvoation regarding animal welfare) – Major controversies relating to animal welfare	exclusion criterion: Corporate credits and Project finance (100 %)
12	Companies reduce the time limit of animal transport to a maximum of 8 hours.	Yes	– Animal welfare standards (e Transportation)	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
13	Companies apply a prudent use of antimicrobial medicines (antibiotics) in food-producing animals in order to minimize antimicrobial resistance.			
14	Companies reduce their direct and indirect greenhouse gas emissions.	Yes	– Greenhouse gas emission reduction targets and action plans – Greenhouse gas emission intensity	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
15	Companies reduce their direct and indirect emission of harmful substances, such as particulate matter, nitrogen oxide and ammonia.	Yes	– Greenhouse gas emission reduction targets relating to agricultural production along the value chain – Measures to reduce climate impacts of agricultural production along the value chain – Major controversies relating to the climate impact of agricultural production along the value chain – Greenhouse gas emission intensity (agricultural production) – COD emission intensity – Waste intensity	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
16	Conversion of peatland and high-carbon stocks for agricultural development is unacceptable	Yes	– Greenhouse gas emission reduction targets relating to agricultural production along the value chain – Measures to reduce climate impacts of agricultural production along the value chain – Major controversies relating to the climate impact of agricultural production along the value chain	exclusion criterion: Corporate credits and Project finance (100 %)
17	Companies contribute to an ambitious, time-bound shift from animal protein to plant and alternative proteins in order to decrease animal protein consumption.			
18	Companies minimise use of pesticides.	Yes	– Policy on sustainable agricultural practices in company and supply chain – Measures to promote sustainable agricultural practices in company and supply chain – Stock farming in company and supply chain: Measures to ensure sustainable animal feed – Measures to ensure sustainable fish farming in company and supply chain	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
18	Companies use as little water as possible.	Yes	– Position on water conservation in agricultural production along the value chain – Measures to ensure water conservation in agricultural production along the value chain – Major controversies relating to water conservation in agricultural production along the value chain Policy on sustainable agricultural practices in company and supply chain – Measures to promote sustainable agricultural practices in company and supply chain – Stock farming in company and supply chain: Measures to ensure sustainable animal feed	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association

19	Companies minimise use of water.	Yes	Position on water conservation in agricultural production along the value chain", " Measures to ensure water conservation in agricultural production along the value chain" , "Major controversies relating to water conservation in agricultural production along the value chain", "Policy on sustainable agricultural practices in company and supply chain" , "Measures to promote sustainable agricultural practices in company and supply chain", "Stock farming in company and supply chain: Measures to ensure sustainable animal feed"	Über die im Nachhaltigkeitsfilter genannten Branchen hinaus, schließen wir daher u.a. Kundenkredite und Projektfinanzierungen in folgenden Bereichen aus: industrielle Nahrungsmittelproduktion
20	Companies prevent water pollution.	Yes	– Soil and biodiversity management in agricultural production – Impact of aquaculture and fisheries on aquatic ecosystems – Measures to ensure sustainable aquaculture along the value chain – COD emission intensity	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
21	Companies conduct water scarcity impact assessments and prevent negative impacts in water scarce regions.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress, Freshwater use inventories, Freshwater use reduction targets and action plans)	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
23	Companies work with relevant standards and initiatives for raw materials (mentioned in section 3.4.2).	Yes	– Share of raw materials from certified organic farming – Percentage of certified palm oil	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
24	Companies are certified according to the criteria of the certification schemes for raw materials (mentioned in section 3.4.2).	Yes	– Share of raw materials from certified organic farming – Percentage of certified palm oil	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
25	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.	Yes	– Sustainability reporting Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
26	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting) Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
27	Companies integrate social, economic and environmental criteria in their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association
28	Companies include clauses on the compliance with social, economic and environmental criteria in their contracts with subcontractors and suppliers.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions	Corporate credits and Project finance: exclusion of companies in the food sector by articles of the association

Mining

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:		Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
1	Companies prevent negative impact on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN).	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
2	Companies prevent negative impact on UNESCO World Heritage sites.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation – Policy on human rights – Human rights due diligence procedures	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
3	Companies prevent negative impact on protected areas that fall under the Ramsar Convention on Wetlands.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector

4	Companies mitigate the chance of accidents by making use of the best available techniques and have a solid road map for crisis situations (a so-called 'contingency plan').	Yes	– Facility safety management a. Responsibilities and training b. Risk assessments c. Performance monitoring and incident investigation d. Inspections and maintenance – Emergency response and preparedness a. Emergency response plan b. Emergency drills c. Emergency cooperation d. Crisis communication	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
5	Companies do not operate in locations where the consequences of an accident for the environment are unmanageable.	Yes	Exclusion criterion: controversial environmental practices	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
6	Companies reduce extractive waste and manage and process this in a responsible way by adequately tracking, reviewing and acting to improve their tailings risk management and by adopting a zero-failure objective to tailings storage facilities.	Yes	– Tailings and waste rock management a. Asset integrity b. Progressive tailings processing and treatment techniques c. Safety and emergency preparedness d. Acid Mine Drainage management	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
7	Riverine tailings disposal and sub-marine tailings disposal is unacceptable.	Yes	Exclusion criterion: controversial environmental practices	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
8	Companies conduct water scarcity impact assessments and prevent negative impacts in water scarce regions.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress, Freshwater use inventories, Freshwater use reduction targets and action plans)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
New Wording	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are liklely.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress) – Policy on human rights (Right to water) – Human rights due diligence procedures	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
10	Companies include the environmental and health effects of a mine after ist closure in planes for the development of new mines.	Yes	Standards for site closure, decommissioning and reclamation a. Multi-stakeholder approach b. Financial provisions c. Environmental considerations	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
11	Companies ensure the complete recovery of ecosystems after commercial activities have been completed, for all extractive industry projects (i.e. this is included as an activity in the planning and the budget of the project).	Yes	– Standards for site closure, decommissioning and reclamation – Percentage of projects with a mine closure plan in place – Monitoring and evaluation of closed and/or decommissioned sites	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
12	Companies enhance small scale and artisanal mining that improves sustainable economic and social development on a local level.	Yes (marginally)	– Policy on human rights (Traditional livelihoods) – Human rights due diligence procedures – Community outreach and consultation – Community involvement	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
13	Companies respect the ILO Declaration on Fundamental Principles and Rights at work.	Yes	– Freedom of association – Equal opportunities and non-discrimination – Pay and benefits – Worklife balance – Health and safety – Training	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector

14	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Yes	– Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
New Wording	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
16	Companies follow the Voluntary Principles on Security and Human Rights for the security of their employees and company premises.	Yes	– Policy on human rights	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
17	Companies have processes to enable the remediation of any adverse human rights impact to which they cause or to which they contribute.	Yes	– Policy on human rights – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
18	Companies pay taxes owed in each country where they operate	Yes	– Tax base erosion and profit shifting a Transfer pricing b Presence in jurisdictions enabling tax base erosion and profit shifting i Position on presence in jurisdictions enabling tax base erosion and profit shifting ii Transparency on presence in jurisdictions enabling tax base erosion and profit shifting: – Public disclosure of payments to government a Payments by country b Types of payments – Public disclosure of economic activity a Employees by country: b Revenues by country: c Profits by country: – Public disclosure of financial assistance received from governments – Major controversies relating to financial relations with governments – Major controversies relating to business ethics	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
19	For each country in which companies operate, they report country-by-country on their revenues, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).	Yes	– Public disclosure of payments to government – Public disclosure of financial assistance received from governments	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
20	Offering, promising, giving and requiring, either directly nor indirectly, bribes or other undue advantages in order to acquire or to maintain assignments or other undue advantages, is unacceptable.	Yes	Exclusion criterion: korruption, Corporate Governance-Kodex für Genossenschaften, Punkt 4.3.2	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
21	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.	Yes	– Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies – Major controversies relating to human rights	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector

22	Mining and trading in conflict materials is unacceptable.	Yes	– Promotion of transparency and certification of origin in ore and metal trade chains – Transparency on accessibility and types of reserves – Major controversies relating to customer and product responsibility – Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies – Major controversies relating to human rights	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
23	Uranium mining is unacceptable.	Yes	Exclusion criterion: nuclear power (producer/mining uranium > 5% of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
25	Mountaintop removal mining is unacceptable.	Yes	Exclusion criterion: coal producers (> 5 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
26	Establishing new coal mines is unacceptable	Yes	Exclusion criterion: coal producers (> 5 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
27	Thermal coal mining is unacceptable.	Yes	Exclusion criterion: coal producers (> 5 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
	Metallurgical coal mining is unacceptable.	Yes	Exclusion criterion: coal producers (> 5 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
28	Companies work with relevant standards and initiatives for certain minerals (mentioned in section 3.8.2).	Yes	– Promotion of transparency and certification of origin in ore and metal trade chains	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
29	Companies are certified according to the criteria of certification schemes for certain minerals (mentioned in section 3.8.2).	Yes	– Promotion of transparency and certification of origin in ore and metal trade chains	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
30	Companies publish a sustainability report that may contain (a number of) the Standard Disclosures of the GRI G4 Sustainability Reporting Guidelines.	Yes	– Sustainability reporting Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
31	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting) Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector
32	Companies integrate social, economic and environmental criteria in their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions – Measures to enable key suppliers to safeguard labour rights and improve working conditions	Corporate credits and Project finance: exclusion of companies with business segments in the mining sector

Oil & Gas

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:	Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)

1	Companies prevent negative impact on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN).	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation Anmerkung Rankabrand: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9). – Policy on activities in protected areas and further areas of particular importance for biodiversity – Activities in protected areas and further areas of particular importance for biodiversity – Disclosure of number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
2	Companies prevent negative impact on UNESCO World Heritage sites.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation – Policy on human rights – Human rights due diligence procedures – Major controversies with regard to human rights Anmerkung Rankabrand: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9).– Policy on activities in protected areas and further areas of particular importance for biodiversity – Activities in protected areas and further areas of particular importance for biodiversity – Disclosure of number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management	exclusion of companies with business segments in the oil and gas sector

3	Companies prevent negative impact on protected areas that fall under the Ramsar Convention on Wetlands.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation Anmerkung Rankabrand: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9).– Policy on activities in protected areas and further areas of particular importance for biodiversity – Activities in protected areas and further areas of particular importance for biodiversity – Disclosure of number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management	exclusion of companies with business segments in the oil and gas sector
4	Companies mitigate the chance of accidents (oil spills, leakages) by making use of the best available techniques and have a solid road map for crisis situations (a so called 'contingency plan').	Yes	– Strategy to reduce use of substance of concern in production processes – Hazardous waste management – Management of high-volume hydraulic fracturing a Chemicals management b Water use strategy c Well integrity management d Management of fugitive methane emissions – Percentage of closed-loop management systems used in high-volume hydraulic fracturing operations – Offshore oil spill prevention and contingency planning – Environmental safety standards of vessels – Pipeline integrity and safety management a Guidelines for design and construction b Risk assessments c Inspections and maintenance d Prevention of third-party damage e Replacement programmes f Emergency response and preparedness – Major controversies relating to tanker safety and pipeline integrity – Environmentally safe operation of facilities a Air emissions b Disposal of substances of concern c Spill preparedness and response d Substitution of hydrofluoric acid in alkylation – B.2.4.1.3.1. Facility safety management a Responsibilities and training	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
5	Companies do not operate in locations where the consequences of an accident for the environment are unmanageable.	Yes	Exclusion criterion: controversial environmental practices	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector

6	Companies reduce waste from oil and gas extraction and mining, especially the flaring of natural gas, and manage and process this in a responsible way.	Yes	– Strategy to reduce use of substance of concern in production processes – Hazardous waste management – Reduction of gas flaring and venting	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
7	Companies include the environmental and health effects of the dismantling of production facilities, especially of offshore drilling platforms, in plans for the development of new projects.	Yes	– Standards for site closure and reclamation a Multistakeholder approach b Financial provisions c Environmental considerations *Anmerkung: KD Bank addresses that aspect, but does actually not specify for environmental and health effects of the dismantling of production facilities like offshore drilling platforms.*	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
8	Companies conduct water scarcity impact assessments in water scarce regions.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress, Freshwater use inventories, Freshwater use reduction targets and action plans)	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
New Wording	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	Yes	– Water risk and impact (Activities and impacts in regions with high levels of water stress) – Policy on human rights (Right to water) – Human rights due diligence procedures	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
11	Companies respect the ILO Declaration on Fundamental Principles and Rights at Work.	Yes	see "Labour rights" folder	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
12	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
13	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
14	Companies follow the Voluntary Principles on Security and Human Rights for the protection of their employees and the company sites.	Yes	– Policy on human rights	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
15	Companies have processes to enable the remediation of any adverse human rights impact to which they cause or to which they contribute.	Yes	– Policy on human rights – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
16	Companies pay the taxes owed in each country where they operate	Yes	– Tax base erosion and profit shifting a Transfer pricing b Presence in jurisdictions enabling tax base erosion and profit shifting i Position on presence in jurisdictions enabling tax base erosion and profit shifting ii Transparency on presence in jurisdictions enabling tax base erosion and profit shifting: – Public disclosure of payments to government a Payments by country b Types of payments – Public disclosure of economic activity a Employees by country: b Revenues by country: c Profits by country: – Public disclosure of financial assistance received from governments – Major controversies relating to financial relations with governments – Major controversies relating to business ethics	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector

17	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).	Yes	– Public disclosure of payments to government a Payments by country b Types of payments – Public disclosure of economic activity a Employees by country: b Revenues by country: c Profits by country: – Public disclosure of financial assistance received from governments	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
18	Offering, promising, giving, or requiring, either directly nor indirectly, bribes or other undue advantages in order to acquire or to maintain assignments or other undue advantages, is unacceptable.	Yes	-new exclusion criterion (revision 2016): corruption; Corporate Governance-Kodex für Genossenschaften, Punkt 4.3.2	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
19	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.	Yes	– Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies – Major controversies relating to human rights	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
20	Extracting oil from tar sands is unacceptable.	Yes	new Exclusion criterion: Extracting oil from tar sands is unacceptable.	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
21	Extracting oil from oil shale is unacceptable.	Yes	Exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
22	Extracting fuel from liquefied coal is unacceptable.	Yes	Exclusion criterion: processor coal >5%	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
23	Extracting shale gas in unacceptable.	Yes	Exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
24	Arctic drilling for oil and gas is unacceptable.	Yes	Exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
25	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.	Yes	– Sustainability reporting Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
26	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting) Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector
27	Companies integrate social, economic and environmental criteria in their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions	Corporate credits and Project finance: exclusion of companies with business segments in the oil and gas sector

Power Generation

Fair finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:	Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)

4	Unabated coal-fired power generation (i.e. without operational carbon capture and storage) is unacceptable.	*Yes*	Exclusion criterion: coal processors >5%	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
5	Coal fired power generation is unacceptable	*Yes*	Exclusion criterion: coal processors >5% relevant	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
6	Fossil fuel fired power generation are unacceptable.	Yes	Exclusion criterion: total fossil-fuel-related activities (> 30 % of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
7	Nuclear energy is unacceptable.	Yes	Exclusion criterion: nuclear power (producer/nuclear power > 5% of net sales)	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
8	Large scale hydropower generation is unacceptable	Not exactly in this wording/consequence, but thematic coverage (large hydropower is addressed in the ISS ESG Rating it is only deemed unacceptable when not planned and operated according to advanced environmental and human rights / social standards)	– Measures to ensure the sustainable operation of hydro power stations – Major environmental controversies, fines or settlements relating to energy generation – Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies – Major controversies relating to human rights	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
9	Companies prevent negative impact on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN).	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation *Anmerkung: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9).*	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)

10	Companies prevent negative impact on UNESCO World Heritage sites.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation – Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies *Anmerkung: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9).*	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
11	Companies prevent negative impact on protected areas that fall under the Ramsar Convention on Wetlands.	Yes	– Protected areas a. Policy on activities in protected areas and further areas of particular importance for biodiversity b. Activities in protected areas and further areas of particular importance for biodiversity c. Disclosure of the number of projects within protected areas and further areas of particular importance for biodiversity – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation *Anmerkung: Adherence to respective nature conservation requirements is not specifically mentioned by KD Bank (see link, page 3-9).*	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
12	Companies prevent conflicts over land rights and acquire natural resources only by engaging in serious consultation with local communities and obtaining free, prior and informed consent (FPIC)	Yes	– Policy on human rights (e.g. resettlement and compensation; indigenous peoples and traditional livelihoods) – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
14	Companies have processes to enable the remediation of any adverse human rights impact to which they cause or to which they contribute.	Yes	– Policy on human rights – Community outreach and consultation	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)

15	The construction of dams complies with the 7 principles of the World Commission on Dams (WCD).	Yes	– Measures to ensure the sustainable operation of hydro power stations – Major environmental controversies, fines or settlements relating to energy generation – Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation – Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
16	The construction of all water infrastructure projects complies with the 7 principles of the World Commission on Dams (WCD).	Yes	– Biodiversity management a. Risk and impact assessments b. Consultation with biodiversity experts c. Targets and objectives d. Mitigation measures e. Monitoring and evaluation – Policy on human rights – Human rights due diligence procedures i. Human rights risk and impact assessment ii. Human rights trainings iii. Integration of stakeholders in human rights management iv. Monitoring and auditing v. Grievance and remedies	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
17	The production of biomaterials complies with the 12 principles of the Roundtable on Sustainable Biomaterials (RSB).	Yes	– Measures to ensure the sustainable production and sourcing of biomass	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
18	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.	Yes	– Sustainability reporting Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
19	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.	Yes	– Sustainability reporting (Reporting topics, Reporting quality, Assurance of reporting) Der GRI-Standard hat die Entwicklung der Reserach-Methodik stark geprägt. Eine Konformität kann sich positiv in der Bewertung eines Unternehmens widerspiegeln. Andere Reportings können jedoch ebenso berücksichtigt werden.	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)
20	Companies integrate social, economic and environmental criteria in their procurement and operational policies.	Yes	– Environmental supplier standard – Procedures to ensure compliance with the environmental supplier standard – Green procurement of office supplies – Supplier standards with regard to labour rights and working conditions – Procedures to ensure compliance with supplier standards on labour rights and working conditions	Corporate credits and Project finance: exclusion of companies with business segments in the power generation sector (without renewable energy generation)

Gender equality

Grundsätzliche Aussagen zum Themenfeld Gender Equality =>

Die Bank für Kirche und Diakonie hat das Ziel, 30 Prozent der Führungspositionen auf allen Ebenen mit Frauen zu besetzen. Dieses Ziel ist in der Personalstrategie der Bank verankert und der Vorstand der Bank berichtet dem Aufsichtsrat jährlich über den Status und die Maßnahmen der Bank. Als Maßnahmen wurde zum Beispiel definiert, dass bei gleicher Eignung Bewerber des unterrepräsentierten Geschlechts bevorzugt werden sollen und der Anteil der weiblichen Trainees mindestens gleich dem Anteil der männlichen Trainees sein soll (aktueller Status: 60 Prozent).

	Fair Finance Guide: The following elements are crucial for a policy regarding the companies a financial institution invests in:	Bestandteil Ratingprozess	Genaue Definition des Kriteriums in der ISS ESG Ratingsystematik:	Darüber hinaus Ausschluss im Kundenkreditgeschäft (Corporate credits und Project finance)
New Wording	Companies have made a policy commitment to mitigate the human rights risks faced by people as a result of their gender.	Yes	- Human rights policies and standards - Policy on non-discrimination - No difference made between men and women	
New Wording	Companies have an explicitly gender-sensitive zero tolerance policy towards all forms of gender-based discrimination, including psychological harm and verbal, physical and sexual harassment.	Yes	- Policy on non-discrimination	
9	Companies have systems in place to actively manage pay equity.	Yes	- Equal opportunities and non-discrimination - Public disclosure of CEO to employee compensation ratio	
10	Companies have systems in place to prevent and mitigate gender discrimination of its customers.	Yes	The research process covers allegations of companies discriminating against its customers based on gender under the keyword “Discriminatory treatment of consumers” (definition: This category applies to companies criticised for discriminating against consumers on grounds that include age, disability, gender, medical condition, national origin, race, religion or sexual orientation. Not to be confused with workplace discrimination, which falls under labour rights.).	
New Wording	Companies guarantee at least 30% participation and equal access of women and men at senior level positions.	Yes	The company has to ensure the proportional representation of women in management positions and gender parity in the executive management team.	
New Wording	Companies guarantee at least 40% participation and equal access of women and men at senior level positions.	Yes	The company has to ensure the proportional representation of women in management positions and gender parity in the executive management team.	
13	Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.	Yes	The company has to ensure the proportional representation of women in management positions and gender parity in the executive management team.	
14	Companies include gender and women's rights criteria in their procurement and operational policies.	Yes (operational policies)	- Policy on non-discrimination	
15	Companies include clauses on the compliance with gender and women's rights criteria in their contracts with subcontractors and suppliers.	Yes	The supplier standard has to be signed by suppliers. The wording of the standard (or the vast majority of its requirements) is binding. Bindingness consists of two requirements, only in case both are met for all (or the vast majority) of standards a grade is awarded: 1) suppliers have to sign the standard / contractually abide by the standard (e.g. by incorporating standard into contracts) 2) wording of the standard must be binding (e.g. "suppliers shall/are required" / "we expect suppliers to..." instead of "suppliers should/are encouraged") The following indicators are checked: prohibition of forced labour prohibition of child labour Reference to ILO Freedom of Association Health and Safety Wages Working Time Regular employment migrant workers harrasment and abusive behaviour discrimination Inclusion of extended supply chain	

Erläuterungen zum Thema Renumeration

4	The fixed salary does not exceed twenty times the lowest salary or the maximum of the lowest salary scale within the financial institution.	Die Bank für Kirche und Diakonie veröffentlicht die Einkommen der Vorstände im Freiwilligen Offenlegungsbericht nach § 16 Instituts-Vergütungsverordnung (https://www.kd-bank.de/wir_fuer_sie/ueber-uns.html). Das Verhältnis zwischen dem höchsten Einkommen und dem niedrigsten Einkommen liegt aktuell deutlich unter 20. Im Rahmen der Nachhaltigkeitsberichterstattung berichtet die KD-Bank über das Verhältnis der Jahresvergütung des höchstbezahlten Mitarbeiters zum mittleren Niveau (Median) der Jahresvergütung aller Beschäftigten (ohne den höchstbezahlten Mitarbeitenden) betrug im Berichtsjahr 2018: 1:6,2.

Erläuterungen zum Thema Transparency and Accountability

21	The financial institution has complaint mechanisms for clients and non-clients.	Die Beschwerdemanagement-Prozesse der Bank für Kirche und Diakonie sind hier beschrieben: https://www.kd-bank.de/wir_fuer_sie/lob-und-kritik.html Über diese Prozesse hinaus besteht für unsere Stakeholder - im weitesten Sinne des Wortes - die Möglichkeit bei vermuteten Verstößen gegen die OECD-Richtlinien Rückgriff auf die Nationalen Kontaktstellen (NKS) der OECD, zu deren Aufgaben auch die Lösung von Problemen, die sich aus der angeblichen Nichteinhaltung der OECD-Richtlinien ergeben, zu koordinieren. Die Bank für Kirche und Diakonie wird sich nach einer rechtlichen Prüfung an die Entscheidungen der NKS halten.
22	The financial institution establishes or participates in effective operational-level grievance mechanisms for individuals and communities which may be adversely impacted by activities that it is connected to.	
23	The financial institution reports on the grievance mechanism process, including its progress and performance.	
24	The financial institution commits to respecting and cooperating in good faith with State-based non-judicial and judicial grievance mechanisms when cases that it is connected with are brought to such a mechanism.	